

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: BAIR HUGGER FORCED AIR
WARMING DEVICES PRODUCTS
LIABILITY LITIGATION

MDL NO. 15-2666 (JNE/FLN)

This Document Relates to:
Weimer, 0:16-CV-00621-JNE-FLN

**AFFIDAVIT OF ROSA S. TREMBOUR IN OPPOSITION TO
DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

STATE OF MINNESOTA)
)
COUNTY OF HENNEPIN)

I, Rosa S. Trembour, being first duly sworn on oath, depose and state as follows:

1. I am an attorney at Lockridge Grindal Nauen P.L.L.P. and Counsel for Plaintiff Margaret Weimer in the above-captioned matter.

2. I submit this affidavit in Opposition to Defendants' Motion to Dismiss Plaintiff's Complaint.

3. Attached as Exhibit A is a true and correct copy of a January 18, 2017 letter from Yvonne Flaherty to defense counsel regarding the Plaintiff Fact Sheet submission.

4. Attached as Exhibit B is a true and correct copy of defense counsel's January 18, 2017 e-mail response.

5. Attached as Exhibit C is a true and correct copy of an April 14 and April 21, 2017 e-mail exchange between Plaintiff's Counsel and Liaison Counsel.

6. Attached as Exhibit D is a true and correct copy of defense counsel's June 1, 2017 e-mail confirming service of the Plaintiff Fact Sheet.

7. Attached as Exhibit E is a true and correct copy of a June 7, 2017 letter from Yvonne Flaherty to defense counsel regarding Plaintiff Fact Sheet deficiencies.

8. Lockridge Grindal Nauen P.L.L.P. communicated with Ms. Weimer (or attempted to communicate) via telephone and/or written correspondence on at least 19 occasions between December 2016 and May 2017. The vast majority of these communications occurred between December 2016 and March 2017.

FURTHER AFFIANT SAYETH NOT.

s/ Rosa S. Trembour
Rosa S. Trembour

Subscribed and sworn to before me
this 14th day of June, 2017.

/s/ Barbara R. Gilles
Notary Public/My Commission
Expires Jan. 31, 2020